

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Jacqueline Mekhail, Gregg Lurie, Heidi
Kaliher, and Tracy Knight individually,
and on behalf of those similarly situated,

Plaintiffs,

v.

North Memorial Health Care, d/b/a North
Memorial Health,

Defendant.

)
) Case No. 0:23-cv-00440-KMM-TNL
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)

**NOTICE OF STIPULATION TO
FILE SECOND AMENDED
COMPLAINT PURSUANT TO
FED. R. CIV. P. 15(a)(2)**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 15(a)(2), Plaintiffs Jacqueline Mekhail, Gregg Lurie, Heidi Kaliher, and Tracy Knight (“Plaintiffs”) and Defendant North Memorial Health Care, d/b/a North Memorial Health hereby stipulate to permit Plaintiffs to file the Second Amended Complaint, a copy of which is filed with this stipulation. Defendant reserves the right to challenge the sealing of the Second Amended Complaint.

The parties further stipulate that Defendant shall have 21 days to respond to the Second Amended Complaint from the date of receiving service of the as-filed Second Amended Complaint.

Respectfully submitted,

Dated: October 31, 2024

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Dated: October 31, 2024

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